

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

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IN RE: DA VINCI SURGICAL                      Lead Case No.  
ROBOT ANTITRUST LITIGATION,                      3:21-cv-03825-VC  
/  
SURGICAL INSTRUMENT SERVICE  
COMPANY, INC.,

Plaintiff,

vs.    No. 3:31-cv-03496-VC

INTUITIVE SURGICAL, INC.,

Defendant.

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(HIGHLY CONFIDENTIAL - ATTORNEY'S EYES ONLY)

VIDEOTAPED VIRTUAL VIDEOCONFERENCE

DEPOSITION OF SHARATHCHANDRA "SHARK" SOMAYAJI

November 4, 2022

Reported by: Kimberly L. Avery, CSR No. 5074

Job No. 5563382

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1 VIDEOTAPED VIRTUAL VIDEOCONFERENCE  
2 DEPOSITION OF SHARATHCHANDRA "SHARK" SOMAYAJI  
3

4 BE IT REMEMBERED, that pursuant to Notice, and on  
5 the 4th day of November 2022, commencing at the hour of  
6 11:32 a.m., via videotaped virtual videoconference,  
7 before me, Kimberly L. Avery, a Certified Shorthand  
8 Reporter, personally appeared SHARATHCHANDRA "SHARK"  
9 SOMAYAJI, produced as a witness in said action, and  
10 being by me first duly sworn, was thereupon examined as  
11 a witness in said cause.  
12

13 ---o0o---

14 APPEARANCES:

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10 Also Present:

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12  
13  
14  
15  
16  
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20  
21  
22  
23  
24  
25

1 at the time.

2 Q. And -- and who is Gabe Loring?

3 A. Gabe Loring is an engineer in the  
4 equipment team.

5 Q. And it appears that you got some 14:25  
6 information that led you to conclude that  
7 bypassing lives applies to Si only.

8 Do you see that?

9 A. That is correct.

10 Q. And then it states, "Xi is impossible 14:25  
11 according to them."

12 Do you see that?

13 A. That is correct.

14 Q. What did you mean by "Xi is impossible  
15 according to them"? 14:25

16 A. I am trying to imply that changing the  
17 lives of Xi instruments is impossible.

18 Q. Does -- do Si instruments have an RFID  
19 tag?

20 A. No, they do not. 14:25

21 Q. Do they have a chip that includes a use  
22 counter?

23 A. Yes, they do.

24 Q. Is the chip of the Si instrument that  
25 includes the use counter different than the chip 14:26

1 of an Xi instrument that includes a use counter?

2 A. That's correct.

3 Q. What are those differences?

4 A. We're getting into more nerding --  
5 nerding. 14:26

6 So, the Si instrument has something called  
7 a Dallas chip, Dallas one-wire chip -- sorry, Kim,  
8 I'll be slow -- have a Dallas one-wire chip. And  
9 they have four mechanical pins called pogo pins.  
10 These are pins that move in and out, that make the 14:26  
11 connection to the robot. They have a physical  
12 connection. They don't have power source. They  
13 need to talk to the robot to deliver power, and  
14 then they need to communicate to the robot through  
15 the physical mechanical pogo pins. 14:27

16 In case of --

17 THE REPORTER: Are you saying pogo pins?

18 THE WITNESS: Pogo, P-O-G-O, pins.

19 In case of Xi instruments, we have an RFID  
20 chip which does not have any electrical or 14:27  
21 mechanical connection other than it is talking  
22 through RF energy to the robot.

23 BY MR. VAN HOVEN:

24 Q. Got it.

25 And is it your understanding that there's 14:27